



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278

August 22, 2024

VIA ECF AND EMAIL

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
New York, New York 10007

Re: *United States v. Larmore*, 24 Cr. 140 (PAE)

Dear Judge Engelmayer:

The Government writes in response to Dickinson Wright's motion to withdraw as counsel for the defendant, Jonathan Larmore, to bring two issues to the Court's attention. Dkt. No. 46.

First, the Government has spoken to Larmore's proposed incoming counsel: Bruce L. Udolf, Esq. and Richard Asche, Esq.¹ Both counsel confirmed their awareness of the Court's scheduling order, including tomorrow's deadline for responses to motions *in limine*, and the trial date of October 15, 2024. Both counsel also confirmed that they are not seeking any adjustment to the current schedule. The Government made clear that it would object to any request to adjourn the October 15, 2024 trial date.

Second, after Mr. Asche files a notice of appearance, the Court may wish to schedule a *Curcio* hearing. Mr. Asche recently represented Mr. Larmore's fiancée, Annaliese Cochran, during an interview with the Government on August 7, 2024. Ms. Cochran has firsthand knowledge of, and discrete involvement in, the offense conduct underlying the Indictment. Given the prospect that Ms. Cochran may be a witness at trial, a *Curcio* hearing is warranted. If the Court agrees, the Government will submit a letter in advance of such a hearing setting forth the applicable law and proposing questions for the Court to ask.


¹ On August 20, 2024, Mr. Udolf filed a notice of appearance and a motion in this Court, seeking his admission *pro hac vice*. Mr. Asche has not yet filed a notice of appearance, but we understand from speaking with Messrs. Udolf and Asche that Mr. Asche intends to notice his appearance and represent Larmore at trial.

Hon. Paul A. Engelmayer
August 22, 2024

Page 2

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: 
Justin V. Rodriguez
Adam S. Hobson
Sarah Mortazavi
Assistant United States Attorneys
(212) 637-2591

Cc: Counsel of record (via ECF)
Richard Asche, Esq. (by email)